



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 28, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

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Re: *United States v. Joel Cosme Figueroa et al.*, 22 Cr. 582 (VEC)

Dear Judge Caproni:

The parties respectfully request a two-week extension of their time to file motions in limine, from September 1, 2023 to September 15, 2023, and a one-week extension of the time to file replies to motions in limine, requests to charge, and voir dire, from September 15, 2023 to September 22, 2023. Trial is scheduled in this case to commence on October 23, 2023. Two of the three defendants are in advanced plea negotiations with the Government and are unlikely to proceed to trial. For the third defendant, counsel are engaged in discussions regarding various issues that may obviate the need to file certain in limine motions. Finally, the Government is contemplating imminently seeking a superseding indictment that, while not changing the quantum of evidence or discovery in this case, could expand the time frame of the charged conspiracy or add additional drug types (e.g., fentanyl) that may similarly obviate the need for certain in limine motions. All defendants consent.

Motions *in limine* are due on **September 8, 2023**. Responses to motions *in limine*, requests to charge, and voir dire questions are due **September 15, 2023**.

SO ORDERED.

08/29/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

by: /s/
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cc: Counsel of Record (by ECF)